

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. : _____
STEVEN BROWN	:	VIOLATION:
	:	18 U.S.C. § 2113(a) (bank robbery -
	:	4 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 25, 2004, in Narberth, in the Eastern District of Pennsylvania,
defendant

STEVEN BROWN,

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the PNC Bank, 926 Montgomery Avenue, Narberth, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, that is, approximately \$9,250, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 13, 2004, in Wayne, in the Eastern District of
Pennsylvania, defendant

STEVEN BROWN,

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of
the Wachovia Bank, 367 West Lancaster Avenue, Wayne, Pennsylvania (hereafter “the Bank”),
lawful currency of the United States, that is, approximately \$1,660, belonging to, and in the care,
custody, control, management and possession of the Bank, the deposits of which were insured by
the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2004, in Wynnewood, in the Eastern District of Pennsylvania, defendant

STEVEN BROWN,

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the Citizens Bank, 25 East Wynnewood Avenue, Wynnewood, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, that is, approximately \$2,106.50, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2005, in Narberth, in the Eastern District of Pennsylvania,
defendant

STEVEN BROWN,

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of the PNC Bank, 926 Montgomery Avenue, Narberth, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, that is, approximately \$2,498, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney